

**Duke Energy Progress' Response to  
Vote Solar's First Set of Written Discovery Request  
Pursuant to S.C. Code Ann. § 58-4-55  
Docket No. 2018-318-E  
Related to Hager Testimony  
Date of Request: January 22, 2019  
Date of Response: February 1, 2019**

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☒ NOT CONFIDENTIAL

The attached response to First Data Request #1-4, was provided to me by the following individual: Sumita M. Deshmukh, Rates & Regulatory Strategy Manager, Rate Case Planning & Execution, and was provided to Vote Solar under my supervision.

Heather Shirley Smith  
Deputy General Counsel  
Duke Energy Progress, LLC

**DUKE ENERGY PROGRESS**

**Request:**

- 1-4 Please refer to Hager Direct, p. 15, lines 16-19.  
(a) Please define the term “low use customer”.  
(b) Please provide any analysis the Company has conducted supporting this definition and the associated workpapers in electronic spreadsheet format with all formulas and linkages intact.

**Response:**

In response to (a), Witness Hager’s use of the term “low use customer” was meant to be general in nature. Witness Hager did not intend to imply that there were specific usage thresholds associated with this term.

In response to (b), the Company has no analysis to support a specific definition.

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The attached response to First Data Request #1-18, was provided to me by the following individual: Sumita M. Deshmukh, Rates & Regulatory Strategy Manager, Rate Case Planning & Execution, and was provided to Vote Solar under my supervision.

Heather Shirley Smith  
Deputy General Counsel  
Duke Energy Progress, LLC

**DUKE ENERGY PROGRESS**

**Request:**

- 1-18 On page 12 of Witness Hager's testimony, she testifies that "the Company has also identified a portion of the costs for distribution lines and poles ... that are customer-related."
- (a) Please provide complete and detailed documentation of the input data, methods, and results of the Minimum System analyses used to determine the customer-related components of the Company's investments in:
- i. Primary poles.
  - ii. Secondary poles.
  - iii. Primary overhead conductors.
  - iv. Secondary overhead conductors.
  - v. Primary underground lines.
  - vi. Secondary underground lines.
  - vii. Line transformers.
- (b) Please provide copies of all workpapers, including electronic spreadsheets with cell formulas and file linkages intact, relied on to derive the customer-related portion of costs recorded in FERC Accounts 364-368.

**Response:**

In response to (a), please find attached the "*DEP VS DR 1-18 2017 Min Sys Study.xlsx*" file which contains the analysis for the minimum system portion or customer related percentage of distribution plant by FERC accounts 364 – 368. The "B - Min System Calc" worksheet provides the final calculations supporting these customer vs. demand percentages for each of those FERC accounts.

In response to (b), the "WK 2-8" worksheet in the "*ORS Rates DR 4-1 INPUT PLANT 2017.xlsx*" file attached, applies the percentages from this minimum system study (provided with 1-18(a)), to the SC retail portions of distribution plant balances to derive the customer vs. demand related portion of each of these FERC distribution plant accounts. These percentages are applied across both primary and secondary portions of the FERC accounts, where applicable.

[DEP VS DR 1-18 2017 Min Sys Study.xlsx]

[ORS Rates DR 4-1 INPUT PLANT 2017.xlsx]